

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

Highfields Capital Ltd., Highfields Capital I LP,))
Highfields Capital II LP,))
))
Plaintiffs,))
))
v.)	Civil Action No. 04-10624 MLW
SCOR, S.A.,))
))
Defendant.))
))

**ASSENTED-TO MOTION TO EXTEND TIME TO RESPOND TO DEFENDANT
SCOR'S CROSS-MOTION TO COMPEL PRODUCTION OF DOCUMENTS**

Plaintiffs Highfields Capital Ltd., Highfields Capital I LP, and Highfields Capital II LP hereby request pursuant to Local Rule 7.1(B)(2) that the Court extend by one week, until July 19, 2006, the time in which to respond to Defendant SCOR's Cross-Motion to Compel Production of Documents Relating to Subject Matter Jurisdiction (the "Cross-Motion"). The Cross-Motion was filed on June 28, 2006, making any response currently due by July 12, 2006 under Local Rule 7.1.

As their grounds, Plaintiffs state that their anticipated response raises complex issues and they have been unable to prepare a response within the 14 day period time allotted under Local Rule 7.1 due to the intervening July 4 holiday weekend, pre-existing vacation schedules and other commitments of Plaintiffs' representatives and attorneys, and the need for Plaintiffs to respond to SCOR's emergency motion to stay discovery during the same time period.

In further support, Plaintiffs represent that Defendant has assented to the requested extension.

WHEREFORE, Plaintiffs respectfully request that the Court grant the motion, extend the deadline to respond to the Cross-Motion to July 19, 2006, and grant such other and further relief as is just and proper.

FOLEY HOAG LLP

/s/ Ian J. McLoughlin
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Attorneys for Plaintiffs

July 10, 2006

CERTIFICATION OF COUNSEL PURSUANT TO LOCAL RULE 7.1

I, Kenneth S. Leonetti, certify that on July 6, 2006, I conferred with opposing counsel, Douglas H. Meal, by email, to inquire whether the Defendant would assent to a one week extension of the time in which Plaintiffs could respond the Cross-Motion. Mr. Meal responded that Defendant would agree to this request.

/s/ Kenneth S. Leonetti
Kenneth S Leonetti, BBO # 629515

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of July, 2006, a true copy of the above document was served by facsimile and first class United States mail upon Douglas H. Meal, the attorney of record for Defendant at Ropes & Gray LLP, One International Place, Boston, MA 02110-2624.

/s/ Ian J. McLoughlin
Ian J. McLoughlin, BBO # 647203